



March 7, 2003

Office of Advocacy  
U.S. Small Business Administration  
409 Third Street, S.W.  
Washington, D.C. 20416  
Attn: Keith Holman

Dear Mr. Holman:

On behalf of the Screenprinting and Graphic Imaging Association International (SGIA), the following comments are submitted regarding implementation of the Small Business Paperwork Relief Act of 2002. Our purpose of submitting comments today is to offer suggestions for the facilitation of compliance with federal paperwork requirements that would appeal to screen and digital printers.

SGIA International represents the screen printing and graphic imaging industry and its associated supplier base. There are approximately 35,000 screen printers in the United States. On average, SGIA members have 15 employees per firm. Half of the industry represented by SGIA comprises textile printers, while the other half engages in production of a wide variety of graphic imaging applications on items such as posters, decals, labels, membrane switches, and appliance faceplates.

Specifically, SGIA would like to comment on the proposed publication of a catalog of reporting requirements by industrial sectors. The Small Business Paperwork Reduction Act of 2002 requires establishment of a task force to study the feasibility, in part, of publishing a list of the collections information applicable to small business concerns by *industrial sector description* or "another manner by which small business concerns can more easily identify requirements with which those small business concerns are expected to comply."

SGIA believes creating a single registry of paperwork collection requirements for individual industries would be a positive step in alleviating the tremendous amount of regulatory paperwork requirements placed on small business. However, in order for such a registry of filing requirements to be effective, it must be cataloged in a manner that will enable a small business owner to easily identify his or her particular business within a larger industry category.

SGIA urges the task force to consider cataloging any collections information by specific manufacturing processes, not merely by industrial sector. The printing

and graphic imaging industry has many different manufacturing processes, each with their own individual regulatory paperwork requirements unique to the particular process. For example, screen printers engage in very different manufacturing processes with different regulatory requirements than lithographic printers. To lump the entire industry into one category in a collections catalog under the simple industrial sector heading of “printers” would defeat the purpose of the catalog. Small business owners would still have to sort through a maze of unrelated information to find the specific paperwork requirements applicable to their specific business.

## **Conclusion**

The printing and graphic arts industry comprises a variety of manufacturing processes. The task force should clearly identify and recommend that any catalog of regulatory paperwork collection requirements be broken down according to these different manufacturing processes. Creating a catalog in such a manner would greatly enhance the ability of small business owners to comply with underlying laws and regulations on paperwork and information collections.

Thank you for the opportunity to offer comments. If you have any questions, please do not hesitate to contact me directly at 703-359-1304 or by email at [dwaterfield@sgia.org](mailto:dwaterfield@sgia.org).

Sincerely,

A handwritten signature in black ink, reading "Danielle F. Waterfield". The signature is written in a cursive, flowing style with a large initial "D".

Danielle F. Waterfield  
Government Affairs Associate